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From: L.PALEY (EPA6263) Delivered: Thu 3-Mar-88 15:06 EST
Sys 163 (154)
Subject: SPMS - ATTENTION TIETJEN, WAYNE, SIMS, MCCOY - PLEASE READ ASA
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SPMSGUID.DOC PRELIMINARY DRAFT

March 3, 1988

SUBJECT: FY 1988 and 1989 SPMS Guidance for CEMS

FROM:

TO:

Several Regions have requested additional guidance on the FY 1988 and 1989 CEMS SPMS requirements. Therefore, the attached information delineates our purposes for having the item, what activities we desire, and how we will monitor your progress.

Do not hesitate to contact me, or Louis Paley of my staff (FTS 382-2835) to discuss this matter further.

Attachment

Received from E-mail 3/3/88:SM:Original to Mary Tietjen, copy to Carl Walter and Charles Whitmore

ATTACHMENT

GUIDANCE ON THE FY 1988 AND 1989 CEMS REQUIREMENT IN SPMS

SPMS CEMS REQUIREMENTS

In FY 1988 the requirements stated: "2. Status of SO₂ sources with continuous emissions monitoring (CEM) requirements CEM installation Q1-Q4; and 3. Report for SO₂ sources in nonattainment areas: Compliance status of Class A SO₂ SIP sources and SO₂ NSPS sources Q1-Q4"

In FY 1989 the requirements will be essentially the same, except the first one will explicitly state (what we meant in FY 1988) "CEM installation, operation and reporting".

Please note that the acronym "CEM" is used in the SPMS to mean continuous emission monitoring system (CEMS), as well as fuel sampling and analysis (FSA).

PURPOSES FOR THE REQUIREMENTS

The purposes for the requirements were to further stimulate a nationally consistent minimum level of agency CEMS activity, to motivate you to integrate CEMS into your compliance monitoring activities, and to help you demonstrate to yourself that CEMS do provide programmatic and environmental benefits, particularly for gaseous pollutants. By focusing on one of the Agency's priority topics, SO₂, the SPMS should provide you with the extra benefit of cost-effectively obtaining the continuous compliance status of all major SO₂ emitters.

DESIRED ACTIVITIES

Each Regional Office is responsible for determining the status of compliance of its sources with respect to all current SO₂ CEMS requirements for the installation, operation and reporting of data (e.g., NSPS, SIP, as contained in PSD/NSRs and in Consent Orders). To the extent that violations of such requirements are identified, they should be resolved. Furthermore, such violations are subject to the T&A Guidance and should be placed on the Significant Violators list.

SO₂
non-attainment areas?

To the extent that a Region is uncertain about which sources are required to perform and report on continuous SO2 monitoring, it should emphasize building its inventory during the remainder of FY 1988. Such activities should not be to the total exclusion of determining the compliance status of the sources which the Region currently knows have SO2 CEMS requirements.

SSCD MONITORING OF REGIONAL ACTIVITIES

SSCD will monitor Regional implementation of the aforementioned SPMS requirements through the CEM Subset of the CDS. After each quarter is completed, SSCD will make data retrievals as shown in the following chart.

A. SO2 CEMS INVENTORY:

Fields to be Retrieved

Data to be Retrieved

1.

2.

3.

B. SO2 CEMS COMPLIANCE STATUS AND AGENCY FOLLOW-UP

Fields to be Retrieved

Data to be Retrieved

1.

2.

3.

4.

5.

6.

If you have any questions about this matter, please contact me or Louis Paley of my staff at FTS 382-2835.